



ARKANSAS
Department of Environmental Quality

December 19, 2007

Geomatrix
Attn: Kelly Beck
Project Manager
5725 Highway 290 West, Suite 200-B
Austin, Texas 78735-8722

RE: Current Conditions Report (CCR) for Cedar Chemical Company
EPA ID Number ARD990660649; AFIN 54-00068

Dear Ms. Beck:

The Arkansas Department of Environmental Quality – Hazardous Waste Division (ADEQ) has reviewed the November 21, 2007 Cedar Chemical Company Current Conditions Report (CCR). As discussed with the Cedar Chemical Corporation Joint Defense Group ("the Group") in our meeting on December 4, 2007, the CCR is written with very little project and site current conditions. Current site conditions typically include such items as the status of utilities, the status of production units, the conditions of the secondary containment sumps, the current surface water drainage features and patterns, the current wastewater treatment plant operations, and other related site information. Additional comments based upon our review are as follows:

- The data summary tables show the constituents being compared to the EPA Region VI Human Health Medium Specific Soil Screening Levels (MSSLs) for tap water. The hierarchy used by ADEQ is first the MCL, second the secondary drinking water standards, and then the tap water MSSLs.
- The recent Well Assessment Report was not referenced in the CCR.
- The timeframe Section 3.1 (paragraph 1) for which Vertac operated at the site seems to conflict with the timeframe referenced in Section 3.1 (paragraph 6).

ADEQ understands the next submittal will be the Sampling and Analysis Plan (SAP) on January 18, 2008. If you have any questions, please feel free to contact me at (501) 682-0831 or at benefield@adeq.state.ar.us.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Ryan Benefield".

J. Ryan Benefield, P.E.
Hazardous Waste Division Chief

cc: Mark Hemingway, P.G., Geomatrix
Dave Roberson (DeMaximis, Inc. 2203 Timberloch Place, Suite 213 The Woodlands, TX 77380)
Anne Weinstein, Attorney Specialist, ADEQ
Dara Hall, Attorney Specialist, ADEQ
Allan Gates (Mitchell Williams Selig Gates & Woodyard, PLLC, 425 West Capitol Avenue, Suite 1800, Little Rock, AR 72201-3525)
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Edward Brister (Helena Chemical Co., 225 Schilling Blvd., Suite 300, Collierville, TN 38017)
Dan Burnham (3225 Gallows Road, Suite 8B 0607, Fairfax, VA 22037)
Charles R. Nestrud (Chisenhall, Nestrud & Julian, 400 W. Capitol Ave., Suite 2840, Little Rock, AR 72201)
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David Hawkins (General Counsel & Assistant Secretary, 225 Schilling Blvd., Suite 300, Collierville, TN 38017)
Kim Burke (Taft, Stettinius & Hollister LLP, 425 Walnut Street, Suite 1800, Cincinnati, OH 45202-3957)
Mark Zuschek (3225 Gallows Road, Suite 3D 2110, Fairfax, VA 22039)



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ROUTING SLIP

December 18, 2007

Subject: Cedar CCR Letter

From: Tammie J. Hynum, Technical Branch Manager, Hazardous Waste Division

<u>Route in turn to:</u>	<u>Action Needed</u>	<u>Initials</u>	<u>Date</u>
Jay Rich	Review	JR	12/18/07
Jim Rigg	Review	JR	12/18/07
Clark McWilliams	Review	Can	12/18/07
Kin Siew	Review	KS	12/18/07
Ryan Benefield	Review/Concurrence/Sign	RB	12/18/07

DISPOSITION:

Return to Tammie Hynum, HWD (682-0856) for reproduction, distribution of copies, filing, and mailing.

COMMENTS:

Letter to the Cedar Group (RPs) acknowledging ADEQ received and reviewed the CCR Report.